

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A	§	
BRAZOS LICENSING AND	§	CIVIL ACTION 6:20-cv-00952-ADA
DEVELOPMENT,	§	CIVIL ACTION 6:20-cv-00953-ADA
<i>Plaintiff,</i>	§	CIVIL ACTION 6:20-cv-00956-ADA
	§	CIVIL ACTION 6:20-cv-00957-ADA
v.	§	CIVIL ACTION 6:20-cv-00958-ADA
	§	
ONEPLUS TECHNOLOGY	§	
(SHENZHEN) CO., LTD.,	§	
<i>Defendant.</i>	§	

JOINT MOTION FOR ENTRY OF AGREED ORDER GOVERNING PROCEEDINGS

WHEREAS, the five above-captioned actions are currently pending before the Court but have not been formally consolidated;

WHEREAS, the parties agree that, as detailed in Exhibit A hereto, these cases may be grouped-in-part so as to appropriately limit briefing for claim construction and discovery in this case consistent with the range of technologies at issue; and

WHEREAS, the proposed case groupings and modifications will not affect the date for any hearing, or any final submission to the Court related to a hearing, or the trial;

NOW THEREFORE, the parties stipulate to and request entry of the Agreed Order Governing Proceedings attached as Exhibit A.

Dated: August 22, 2021

RESPECTFULLY SUBMITTED,

By: /s/ Mark D. Siegmund

Jonathan K. Waldrop (CA Bar No. 297903)
(Admitted in this District)

jwaldrop@kasowitz.com

Darcy L. Jones (CA Bar No. 309474)
(Admitted in this District)

djones@kasowitz.com

Marcus A. Barber (CA Bar No. 307361)
(Admitted in this District)

mbarber@kasowitz.com

John W. Downing (CA Bar No. 252850)
(Admitted in this District)

jdowning@kasowitz.com

Heather S. Kim (CA Bar No. 277686)
(Admitted in this District)

hkim@kasowitz.com

Jack Shaw (CA Bar No. 309382)
(Admitted in this District)

jshaw@kasowitz.com

KASOWITZ BENSON TORRES LLP

333 Twin Dolphin Drive, Suite 200

Redwood Shores, California 94065

Telephone: (650) 453-5170

Facsimile: (650) 453-5096

Mark D. Siegmund (TX Bar No. 24117055)

mark@waltfairpllc.com

LAW FIRM OF WALT FAIR, PLLC

1508 N. Valley Mills Drive

Waco, TX 76710

Telephone: (254) 772-6400

Facsimile: (254) 772-6432

Attorneys for Plaintiff

WSOU INVESTMENTS, LLC d/b/a

**BRAZOS LICENSING AND
DEVELOPMENT**

By: /s/ Jacob J.O. Minne

Elizabeth M. Chiaviello
Texas Bar No. 24088913
elizabeth.chiaviello@morganlewis.com
Morgan, Lewis & Bockius LLP
1717 Main Street, Suite 3200
Dallas, TX 75201-7347
T. 214-466-4000
F. 214-466-4001

Michael J. Lyons (pro hac vice)
michael.lyons@morganlewis.com
Ahren C. Hsu-Hoffman
Texas Bar No. 24053269
ahren.hsu-hoffman@morganlewis.com
Jacob J.O. Minne (pro hac vice)
jacob.minne@morganlewis.com
Morgan, Lewis & Bockius LLP
1400 Page Mill Road
Palo Alto, CA 94304
T. 650.843.4000
F. 650.843.4001

**ATTORNEYS FOR DEFENDANT
ONEPLUS TECHNOLOGY (SHENZHEN) CO.,
LTD.**

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2021, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Mark D. Siegmund
Mark D. Siegmund